

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

TECH USA, LLC,

Plaintiffs,

Civil Action No. 1:15-cv-03761-RDB

V.

RYAN G. BABBIE, DIVERSANT, LLC, and
JOHN T. MULLEN,

Defendants.

**CONSENT MOTION TO EXTEND DEADLINE FOR DEFENDANTS TO FILE
ANSWER OR OTHER RESPONSIVE PLEADING TO THE AMENDED COMPLAINT**

NOW COME plaintiff Tech USA, LLC (“Tech USA”) and defendants Ryan G. Babbie (“Babbie”), Diversant, LLC (“Diversant”), and John T. Mullen (“Mullen”) (collectively, “Defendants”), and hereby move this Court to extend the deadline for the Defendants to file their answers or other responsive pleadings to the Amended Complaint to April 8, 2016.

As grounds for this Consent Motion, the parties state that the current deadline for defendants Babbie and Diversant to respond to the Amended Complaint is February 22, 2016, and the current deadline for defendant Mullen to respond to the Amended Complaint is April 8, 2016 (given that he has waived service of the Amended Complaint). Due to certain family obligations on the part of Defendants' attorneys, and to coordinate the timing of all Defendants' responsive pleadings, Tech USA and the Defendants have agreed to extend the deadline for defendants Babbie and Diversant to respond to the Amended Complaint until April 8, 2016. The requested extensions will not prejudice any party.

Accordingly, the parties hereby request that the Court extend the deadline for all Defendants to file their answers or other responsive pleadings until April 8, 2016.

WHEREFORE, the parties jointly request that this Consent Motion be ALLOWED.

TECH USA, LLC,

By its attorneys,

/s/ Allan P. Hillman

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February 12, 2016

RYAN G. BABBIE, DIVERSANT, LLC, and
JOHN T. MULLEN,

By their attorneys,

/s/ Edward V. Arnold

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